

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW MEXICO**

**JAMES WEISENBURGER,**

Plaintiff,

v.

**No. 2:11-cv-00102-MV-GBW**

**JENNIFER STUFFLEBEAN  
LEONARD STUFFLEBEAN and  
BOARD OF COMMISSIONERS OF SIERRA COUNTY,**

Defendants.

**UNOPPOSED MOTION FOR STIPULATED CONFIDENTIALITY ORDER**

Defendant, by and through counsel, Daniel J. Macke, hereby submits its Unopposed Motion for Stipulated Confidentiality Order. In support thereof, Defendant states as follows:

1. Plaintiff has made a discovery request for personnel and other files pertaining to Mr. Stufflebean's employment;
2. Defendant believes certain of the information requested is discoverable, but that Mr. Stufflebean has a corresponding interest in confidentiality of the materials;
3. The Parties have agreed to enter a stipulated confidentiality order which allows for the production of the requested materials, while protecting Mr. Stufflebean's interests;
4. A stipulated order is submitted contemporaneously herewith.

WHEREFORE Defendant respectfully requests that the Motion be granted, and the Stipulated Confidentiality Order be entered.

Respectfully submitted:

By: /s/ Daniel J. Macke  
Daniel J. Macke  
500 Marquette NW, Suite 700  
Albuquerque, NM 87102  
(505) 242-2228  
(505) 242-1106 (facsimile)  
[dan@roblesrael.com](mailto:dan@roblesrael.com)

Approved:

Electronically approved 11.8.11  
Matthew L. Garcia  
George Bach  
300 Central SW, Suite 2000  
Albuquerque, NM 87102  
(505) 899-1030  
(505) 899-1051 (facsimile)  
[matt@bachandgarcia.com](mailto:matt@bachandgarcia.com)

Electronically approved 11.9.11  
Kevin M. Brown  
Desiree Gurule  
2901 Juan Tabo Blvd. NE, Ste. 208  
Albuquerque NM 87112  
(505) 292-9677  
(505) 292-9680 (facsimile)  
[kevin@brownlawnm.com](mailto:kevin@brownlawnm.com)  
[desiree@brownlawnm.com](mailto:desiree@brownlawnm.com)

I HEREBY CERTIFY that on the 9<sup>th</sup> day of November, 2011, I filed the foregoing electronically through the CM/ECF system and a true and correct copy was mailed to:

Matthew L. Garcia  
George Bach  
Bach & Garcia  
300 Central SW, Suite 2000  
Albuquerque, NM 87102  
Phone: 505-899-1030  
Fax: 505-899-1051  
Attorneys for Plaintiff James Weisenburger

Desiree Gurule  
Kevin M. Brown  
2901 Juan Tabo Blvd. NE, Ste. 208  
Albuquerque NM 87112  
Phone: 505-292-9677  
Attorney for Defendant Leonard Stufflebean

/s/ Daniel J. Macke  
Daniel J. Macke